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**Llano National Bank**

September 7, 2005

Director Johns F. Carter  
 FDIC San Francisco Regional Office  
 25 Jessie Street at Ecker Square, Suite 2300  
 San Francisco, CA 94105

Re: Wal-Mart Bank

Dear Mr. Carter:

I would like to register with you, Llano National Bank's opposition to the establishment of a bank by Wal-Mart. The economies of size that Wal-Mart possesses may suggest that it can provide a lower-cost banking alternative for consumers. However, an observation of large regional and nationwide banking organizations does not necessarily reflect any lower cost of banking services than what is provided by local community banks.

The local community bank is essential to the well-being of many rural and suburban communities. Its local customers provide much of the deposit base for these institutions. It is conceivable that Wal-Mart could offer deposit rates that would tend to move these deposits out of the local community bank. It is this community bank that funds many of the commercial and business investments in the community. As these funds are moved out of the community, the local bank may then have to acquire funds at higher rates that would be passed on to its local customers.

Wal-Mart has a history in many communities that suggests that certain types of local businesses do not survive when Wal-Mart moves in. It is conceivable that a Wal-Mart Bank could have a similar effect on smaller community banks such as Llano National Bank. Certainly, it is conceivable that Wal-Mart Bank would not support local businesses (such as pharmacies, grocery stores, sporting goods stores, tire/vehicle accessory stores, clothing stores, etc.) that might compete with its retail superstores. The local community bank that many times is locally owned, may and in many cases probably does have different goals and objectives for the well-being of its community, than what a corporate giant like Wal-Mart might have.

All of these issues are of great concern to me, and I hope that Wal-Mart Bank is not given the green light by FDIC.

Very truly yours,  
 Llano National Bank

David R. Willmann, President

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